

COVID-19 Nita M. Lowey 21st Century Community Learning Center Fall 2020 Frequently Asked Questions (As of 9/8/2020)

The Wisconsin Department of Public Instruction (DPI) understands that Wisconsin Nita M. Lowey 21st Century Community Learning Centers (21st CCLC) have many questions regarding obligations during the COVID-19 (Coronavirus) pandemic. This document is intended to provide answers to some of the commonly asked questions regarding program services and operations related to COVID-19. For information on COVID-19 and its impact on K-12 Education and Libraries, please visit the [DPI's COVID-19 webpage](#). Please contact your [21st CCLC consultant](#) with further inquiries.

General Information

Q1: *Our program did not meet all grant requirements last year due to the COVID-19-related closure of schools. Will the program be penalized?*

A: DPI waived many grant requirements for the 2019-2020 school year, including total days of operation and number of regular attendees. (For a full list of requirement waivers, please see [Amendments and Waivers of Nita M. Lowey 21st Century Community Learning Centers Requirements for 2019-2020](#).) While DPI did not waive the ADA requirement entirely, DPI consultants worked with grantees on a case-by-case basis to address compliance requirements. Such requirements include determining whether or not a program that did not serve the number of students required by its funding tier would be dropped to a lower tier or remain at its current funding level. 21st CCLC grantees will not face sanctions for failing to meet any requirements that were waived by DPI.

Program Operations

Q2: *Are there specific safety procedures or modifications our program must follow in order to offer in-person services?*

A: Grantees should refer to their county health department and local education agency to determine what procedures should be in place to operate safely. Grantees may want to refer to [Education Forward](#), DPI's guidance document for district and school leaders planning for a safe, efficient, and equitable return to school for the 2020-2021 school year amid the COVID-19 pandemic. In particular, grantees may want to consult the [Infection Control and Mitigation section](#) of Education Forward.

Q3: *Are programs still required to ensure safe transportation to and from the program?*

A: Yes. Per the federal statute under Title IV, Part B, of the Every Student Succeeds Act, grantees are required to ensure that safe transportation is available to all program participants and that lack of transportation is not a barrier to participation. Programs are encouraged to survey families of the school served by the grant to determine what the transportation needs may be.

For more information related to this topic , please consult the following resources available through DPI:

- [Considerations for 21st CCLC Programs Operating During the 2020-21 School Year](#)
- [Interim COVID-19 Transportation Guidance](#) found in [Education Forward: Operating Schools During a Pandemic](#) under the *Infection Control and Mitigation* (Prepare, District Level) section

Q4: *How does our program determine which hours count as day school instructional time and which ones count as out-of-school time when schools are operating virtually?*

A: The 21st CCLC program provides students attending qualifying schools opportunities for academic enrichment through a broad array of additional services during “non-school hours or periods when school is not in session (such as before and after school or during summer recess)” as amended by the Every Student Succeeds Act (ESSA). Therefore, a 21st CCLC program may provide services to students before school, evenings, weekends, holidays, summers, other school vacation periods, or any time outside of day school instruction.

According to DPI’s [Regulatory Flexibility Framework](#), when schools are operating virtually, "hours of instruction should be based on the time teachers are available to students and the school district’s estimate of the amount of time needed to accomplish learning objectives each day." Given this guidance, DPI is defining “out-of-school” time as any period of time that is outside of the school’s or district’s hours of instruction, as determined by the school or district.

The hours of instruction and, thus, out-of-school time hours, will differ from district to district, and possibly from school to school within a district. 21st CCLC programs should consult with the districts and schools they serve, including any private schools they serve, to determine when teachers are available to help students and how much time the district or school estimates students will need to accomplish daily learning objectives. Based on that information, 21st CCLC programs should determine what hours of the day would be considered “out-of-school time” for their particular district or school.

If substantially altering the approved 21st CCLC program plan, a [Program Change Request form](#) should be submitted for review.

For more information related to this topic, please consult DPI’s [Considerations for 21st](#)

[CCLC Programs Operating During the 2020-21 School Year](#) document.

Q5: *The effects of COVID-19 may impact the required average daily attendance (ADA) for our tier of funding in 2020-2021. Will our award be reduced if our required ADA is not attained?*

A: Every effort should be made to meet or exceed the targeted number of students associated with your funding tier. DPI recognizes that there are multiple challenges facing programs in 2020-2021 and will work with programs on a case-by-case basis to assist in resolving non-compliance concerns. A [Program Change Request form](#) should be submitted for review if a lower number of students will be targeted for services, particularly if this new targeted number falls below the number required by the tier of funding. Programs that serve fewer students than required by the funding tier and receive approval for the related Program Change Request for the 2020-2021 school year will not be penalized.

Q6: *program was renewed for a year six grant and is required to serve a minimum of 50 regular attendees (students who attend the program 30 days or more). Will our award be impacted if I am unable to reach the regular attendee benchmark?*

A: Every effort should be made to meet or exceed the targeted number of regular attendees students associated with your grant. DPI recognizes that there are multiple challenges facing programs in 2020-2021 and will work with programs on a case-by-case basis to assist in resolving non-compliance concerns. A [Program Change Request form](#) (https://webportalapp.com/sp/wdpi_program_change_request) should be submitted for review if a lower number of students will be targeted for services, particularly if this new targeted number falls below the required number of regular attendees. Programs that serve fewer than 50 regular attendees and receive approval for the related Program Change Request for the 2020-2021 school year will not be penalized.

Q7: *When the 21st CCLC program is operating virtually all or part of the time, what counts as a program day? Are programs operating virtually still required to operate a minimum of 115 days per year?*

A: A program day is any day that at least one 21st CCLC activity is offered to participants. When programs are operating in-person or synchronously online (e.g., through Zoom), the day that the activity is offered is counted as one day, even if only one 21st CCLC activity is provided. When programs are operating virtually or remotely in an asynchronous manner (e.g., through recorded videos, activities posted to a learning platform, etc.), program staff will determine how many days a particular activity will count based on the content of the activity and number of steps in the activity.

DPI may waive the 115 days of operation in 2020-2021 on a case-by-case basis. In some situations, schools may close, and virtual 21st CCLC programming may not occur. Fill out a [Program Change Request form](#), and communicate with DPI regarding your situation.

Q8: *When the 21st CCLC program is operating virtually all or part of the time, what counts as a program hour? Are programs operating virtually still required to operate a minimum of 10 hours per week?*

A: Under normal circumstances, DPI expects programs to operate at least 10 hours per week (in a typical week). However, 10 hours of programming may not be realistic for exclusively virtual programs (e.g., participants may be fatigued from online learning during the school day, virtual programming may require substantially more staff time to develop, etc.). For programs operating entirely virtually or remotely, DPI will waive the requirement that programs operate 10 hours per week during the period in which the program is virtual. However, although DPI will not require 10 hours of program per week during virtual programming, DPI will examine the diversity of activities provided, requiring at least one academic enrichment activity be provided to all participants per week and at least two other types of activities be provided to all participants each week.

For hybrid programs (offering a blend of in-person programming and virtual programming), decisions regarding the requirement to operate 10 hours per week will be made on a case-by-case basis. Fill out a [Program Change Request form](#), and communicate with DPI regarding your program's situation.

For in-person programs, it is anticipated that programs will operate 10 hours per week at a minimum. However, fill out a [Program Change Form form](#) and communicate your program's situation to DPI should that not be possible. Waivers may be granted for in-person programs in regard to hours per week on a case-by-case basis.

Q9: *The 21st CCLC program is unable to operate at the site approved in the grant application or most recently-approved Yearly Progress Report (YPR). Can the program offer services at another location?*

A: Yes. A [Program Change Request form](#) should be submitted for review if a program needs to change its service location. The proposed new location must be safe and accessible, and transportation between the school(s) served, program site, and home cannot be a barrier for any student who wishes to attend the 21st CCLC.

Q10: *Is homework assistance an allowable use of 21st CCLC funds if a school is operating virtually all or part of the time?*

A: DPI considers homework assistance to be a form of remedial instruction and, thus, an allowable activity for 21st CCLC programs. When schools are operating virtually all or part of the time, it becomes more difficult to distinguish which activities assigned by the day school teacher count as school work and which count as homework. Asynchronous instructional activities that are assigned by the day school teacher and are counted as part of a student's instructional time are not considered homework and 21st CCLC funds cannot be used to provide oversight or support to students completing those activities. If

there are activities assigned by the day school teacher that are considered homework by the teacher and are not counted as part of the student's instructional time, 21st CCLC funds may be used to provide assistance to students completing those assignments.

Q11: *Can the program continue to provide snacks and meals to current 21st CCLC participants if the program offers only asynchronous programming?*

A: Yes. There are updated requirements from the United States Department of Agriculture (USDA) available on the [DPI School Nutrition Team's website](#). Contact a School Nutrition team member with any questions.

Reporting Requirements

Q12: *How should we record and report participation in asynchronous remote 21st CCLC activities?*

A: All activities, both synchronous and asynchronous, should be entered into the AS21 Cayen System. Cayen System allows you to enter in-person programming, as well as virtual programming (live, recorded, and take-home activities). Tracking of attendance is required for all synchronous activities (in-person and live virtual programming) in the system, but not required for asynchronous activities. Contact Michael Holstead at holsteam@uwgb.edu or 920-366-9805 for more information.

Use of Grant Funds

Q13: *Will 21st CCLC programs have access to carryover funds from 2019-2020?*

A: All 21st CCLC programs will have access to 2019-2020 carryover funds. This includes programs in year 6 and grantees that were out of compliance with their ADA. Carryover will be capped at 25% of a site's base award. DPI will capture carryover funds in excess of that amount. Grantees will be notified of the availability of carryover funds after all final claims are submitted and processed. Grantees must submit a [Budget Change Request](#) that shows how carryover funds will be spent. Once the budget revision is approved, DPI will issue a revised grant award. Grantees with multiple 21st CCLC sites must track carryover funds by site and use the funds to support programming at the individual sites that generated them.